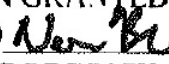




APPLICATION GRANTED
SO ORDERED 
VERNON S. BRODERICK
U.S.D.J. 10/13/2022

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VIA ECF

October 11, 2022

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Hon. Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Spectrum Dynamics Medical Limited (Plaintiff) v. GE et al. (Defendants);*
Case No.: 18-cv-11386 (VSB)

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited in the above-referenced action. We write pursuant to Rule 5.B of Your Honor's Individual Rules & Practices in Civil Cases to respectfully request permission to file Spectrum's Motion for Leave to Amend Complaint and the accompanying exhibits and declarations under seal and in redacted form.

Throughout its motion, Spectrum references a GE patent, by number and other identifying information, that Spectrum seeks to add to its existing correction-of-inventorship claims. The Court previously granted Spectrum's request to redact such information from its First Amended Complaint because "the mere disclosure that GE owns the identified patents containing the trade secrets, with an assertion that they contain misappropriated Spectrum technology, informs potential competitors that Spectrum's system (the first of its kind on the market) contains some of the features disclosed in such patents." D.I. 32 at 1.

The motion also describes (at 1-2 and 9) Spectrum's trade secrets and the subject matter of the GE patent at issue. The Court previously granted Spectrum's request to redact such information as well from its First Amended Complaint. D.I. 32 at 2.

The accompanying exhibits and declarations likewise contain the same information. Exhibits 1-2, for example, are redlined and clean copies of Spectrum's proposed amended complaint, which reference the GE patent by number and describe Spectrum's trade secrets. In addition, the proposed amended complaint also contains information that the Court previously allowed GE to redact. D.I. 35.

For these reasons, Spectrum respectfully requests that the Court allow it to file the Motion for Leave to Amend Complaint and the accompanying exhibits and declarations under seal and in redacted form.



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Respectfully Submitted,

/s/ Esha Bandyopadhyay

Esha Bandyopadhyay

cc: All counsel of record (via ECF)